## CASEY, GENTZ & MAGNESS, L.L.P.

ATTORNEYS AT LAW

98 San Jacinto Blvd., Ste. 1400 Austin, Texas 78701-4296 Phone 512-480-9900 Fax 512-480-9200

Writer's Direct Dial: (512) 225-0027

Robin A. Casey Susan C. Gentz Diane M. Barlow Valerie P. Kirk Bill Magness Bradford W. Bayliff Caroline Scott

September 17, 2008

## **VIA ECFS TRANSMISSION**

Marlene H. Dortch, Secretary Federal Communications Commission Suite TW-A325 445-12th Street, S.W. Washington, DC 20554

RE: EB Docket No. 06-36; Annual 47 C.F.R. §64.2009(e) Certification; Certification of Huntleigh Technology Group, Inc. f/k/a Huntleigh Telecommunications Group, Inc., FCC Filer ID No. 8114774

•

Dear Ms. Dortch:

Pursuant to *Public Notice DA08-171* (Jan. 29, 2008), enclosed herewith for filing with the Federal Communications Commission in the above-referenced docket is the Annual 47 C.F.R. §64.2009(e) CPNI Certification and supporting statement of Huntleigh Technology Group, Inc. f/k/a Huntleigh Technology Group, Inc.

To the extent that you have any questions concerning Huntleigh Technology Group, Inc. f/k/a Huntleigh Technology Group, Inc. or this filing, please contact me.

Sincerely yours,

Bradford W. Bayliff

Attorney for Huntleigh Technology Group, Inc. f/k/a Huntleigh Technology Group, Inc.

Enclosure

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: 09/17/2008

Name of company covered by this certification: Huntleigh Technology Group, Inc. f/k/a Huntleigh Telecommunications Group, Inc.

Form 499 Filer ID: 8114774

Name of signatory: Ross W. Dahman

Title of signatory: President

I, Ross W. Dahman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are compliant with the Commission's modified CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules and what steps it takes to protect its customers' CPNI.

The company has no information to provide with respect to the process pretexters are using to attempt to access CPNI. The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

Ross W. Dahman

President

Huntleigh Technology Group, Inc.

201 E. Main, Suite 510 El Paso, Texas 79901

915-832-0100, x1005 office

## STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

The operating procedures of Huntleigh Technology Group, Inc. f/k/a Huntleigh Telecommunications Group, Inc. ensure that Huntleigh Technology Group, Inc. is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, as required by law, or pursuant to the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations, 47 C.F.R §64.2001 et seq.

Huntleigh Technology Group, Inc. has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of Huntleigh Technology Group, Inc. that is made available to us by the customer solely by virtue of our relationship with our customers, and information contained in the bills pertaining to telephone exchange service or toll service received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or approval as allowed by law and the FCC rules. Any employee that improperly discloses CPNI is subject to disciplinary action, and possible termination. We do not at this time use any vendors that have need to access our customers' CPNI; if, however, this changes, we will ensure that our vendors are aware of the FCC's CPNI rules.

The use of, disclosure of, and access to CPNI, as defined in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. § 64.2001 *et seq.*, is not allowed by Huntleigh Technology Group, Inc. without customer notification and approval as set forth below.

Any notification to a customer must provide notice to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. Notifications will specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purpose for which CPNI will be used, and inform the customer of his or her right to disapprove of those uses, and deny or withdraw access to CPNI at any time. Huntleigh Technology Group, Inc. employees may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call. Huntleigh Technology Group, Inc. will maintain records of notification, whether oral, written, or electronic, for at least one year. If our customers' CPNI is used for Huntleigh Technology Group, Inc.'s sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

Opt-In Notice – This method is required for disclosure of CPNI to unrelated third-parties or to affiliated carriers that do not provide communications-related services and for disclosure of CPNI to affiliated entities providing communications-related services, as well as third party agents and joint venture partners providing communications related services. Huntleigh Technology Group, Inc. will obtain the customer's express, affirmative consent allowing the use and release of CPNI. This requirement does not apply to subscriber listing information given to other carriers for telephone directories pursuant to FCC Rules.

Opt-Out Notice – This method is used only in situations permitted by the Commission's rules. Under this method, the customer is deemed to have consented to the use, disclosure or access to the customer's CPNI if the customer has failed to object thereto within a minimum of 30 days from receiving notice.

Huntleigh Technology Group, Inc. requires customers to provide a password when they contact us before we will release call-detail CPNI. In addition, Huntleigh Technology Group, Inc. notifies customers of account changes and will notify customers of unauthorized disclosure of CPNI if such an event takes place. Huntleigh Technology Group, Inc. does not provide online CPNI access.